

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE Dmitry Kipervas
Debtor.

**: CHAPTER 13
BANKRUPTCY NO. 14-19653-elf**

STIPULATION

Pursuant to the Motion for Relief from the Automatic Stay, filed by The Estates at Huntingdon Valley Homeowners Association Movant and Debtor, Dmitry Kipervas hereby stipulate and agree as follows:

1. The parties hereby agree that the automatic stay under 11 U.S.C. 362(a) shall remain in full force and effect provided that Debtor makes payment to Estates at Huntingdon Valley as follows: Estates at Huntingdon Valley acknowledges receipt of a personal check in the amount of \$729.00. Beginning December 1, 2018 and on every first of the month thereafter until the balance of Debtor's delinquency is brought to a zero balance, Debtor shall make payment to Movant in the amount of \$500.00. In addition to the foregoing monthly payment of \$500.00 toward the delinquency, Debtor shall make timely payment of all regular and special assessments and charges as they become due. Payments which are not received timely will be subject to late charges.

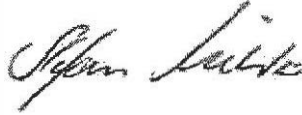
2. Should Debtor fail to make timely payments as provided herein or should any payment be returned, Estates at Huntingdon Valley agrees to give to Debtor ten (10) days written notice of default, mailed first class mail, postage prepaid to Debtor, and counsel for Debtor.

3. Should Debtor fail to make any of the payments as aforesaid within ten (10) days of the date of the written notice of default, Estates at Huntingdon Valley may file a Certification of Default with the Bankruptcy Court, and an Order shall be entered without further notice or court appearance, granting The Estates at Huntingdon Valley Homeowners Association Relief from the Automatic Stay as requested in its Motion.

4. Conversion of the instant case into a Chapter 7 shall constitute default

hereunder, and entitle Estates at Huntingdon Valley to a send a notice of default pursuant to paragraphs 4 and 5 hereof, and if not cured, obtain Relief from the Automatic Stay.

Clemons Richter & Reiss, P.C.



Stefan Richter, Esquire
Attorney for Movant



Carol B. McCullough, Esquire
Attorney for Debtor

ORDER

The foregoing Stipulation is **APPROVED**.

Date: 11/13/18



ERIC L. FRANK
U.S. BANKRUPTCY JUDGE